

March 31, 2021

The Honorable Representative Kaufman
State Capitol Room 405
Juneau AK, 99801

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative Kaufman,

I am one of your constituents and have been a practicing veterinary surgeon in Alaska since 2002. I have served two terms as president of the Alaska State Veterinary Medical Association and have served on the Alaska State Board of Veterinary Medical Examiners.

We, as veterinary professionals and responsible citizens of this amazing state, are still wrangling with the Prescription Drug Monitoring Program (PDMP), a program designed for use in human medicine to identify doctor shopping by human patients and monitor trends in prescribing practices by health care providers. On a daily basis, I run into people who have elected to treat their infirmed animal companion just as they would an infirmed human companion. The problem really is quite simple. Your aunt or mother or father or child or wife or husband is not a turtle or a cow or a dog or a parrot or a gerbil or anything other than a human. The PDMP provides NOTHING allowing veterinarians to benefit people or animals because it is written for the human side of medicine. It is akin to ordering that veterinarians dose thyroid supplementation for dogs just like one would dose thyroid supplementation for people. Look that up. It won't work.

I remember when I was a member of the Alaska State Board of Veterinary Medical Examiners a few years back and we were visited by an individual responsible for getting the veterinary take on this legislation. We asked quite a few questions. I remember asking about the statistics available pertaining to veterinary drug diversion in Alaska. I was quickly informed that it is a problem in the Lower 48. I again asked about statistics in Alaska. There were none. Because you are a body of intelligent individuals who are capable of doing your own research, I am certain that all of you are aware of the following paragraph from a letter to the Board of Directors of the Alaska State Medical Association from Dr. Sarah Coburn, then president of the Alaska State Veterinary Medical Association dated January 29, 2020:

One national survey found that fewer than 10 cases of veterinary shopping occur annually in the United States and concluded that "veterinarians are a *de minimus* source of controlled substances." Even those few cases of veterinary shopping are typically identified by the veterinarians themselves, not through PDMPs. In 2017 veterinarians prescribed 0.34% of all of the opioids dispensed by retail pharmacies in the country (source IQVIA National Prescription Audit).

As a private citizen of this state which does, in fact, have limited resources, I am not happy that the Alaska State Legislature is fighting a problem that is nearly non-existent with funds that the state does not have. As a veterinarian, I am disgusted that the Alaska State Legislature has put veterinarians in a position in which it is more practicable for them to steer away from pain relief. If you, as a legislator, are in favor of this legislation for whatever reason, please promise me that the next time you are confronted with having to have surgery you will look at your surgeon and anesthesiologist and say, "Please, no narcotic pain relief for me." Countless studies and plain common sense have shown us that animals experience pain just like people do.

Exempting veterinarians from participation in the PDMP is not novel. Thirty-two states currently exempt veterinarians from PDMP requirements. I am not suggesting that we do something just because someone else did it. I am suggesting this because the PDMP for veterinarians does NOTHING to help animals or people. It might make someone feel a little bit better by falsely thinking that we are doing something to keep drugs away from people. However, the reality is that the drug diversion problem in the United States is not one that will be solved or even remotely positively influenced by veterinary participation in this extremely non-veterinary program.

There are other reasons not to support the PDMP for veterinarians and they have been illustrated in other letters. Please consider all that you have heard from veterinarians regarding this issue and vote in favor of HB 91 to exempt veterinarians from participation in the PDMP. It is nothing more than a stellar example of poorly conceived and worthless legislation that wastes limited resources.

Respectfully,

Nelson H. Priddy II, DVM
Diplomate American College of Veterinary Surgeons

March 19, 2021

The Honorable Representative Wool
State Capitol Room 501
Juneau AK, 99801-1185

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative Wool:

I own the After Hours Veterinary Emergency Clinic. We have been providing emergency and critical care to the Interior Alaska pets for over 20 years. Part of this care and treatment involves pain control. We don't tend to dispense a lot of narcotics but some animals suffering from major trauma, surgery or cancer require more than just a non-steroid pain medication. I have used the PDMP and found it to be complicated and time consuming. When faced with an emergency, I don't have the time to do the online forms, track down all the information I need to enter. Human pharmacies have their data online and it is easier for them to do the PDMP. Not all veterinarians have the same technology.

I support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for multiple reasons. First and foremost, the PDMP acts as a one size fits all program that animals do not fit into. Animals are lacking a permanent identifier, potential privacy violations, veterinarians already adhere to controlled substance regulations, and the cost to the state.

- **Animals are lacking a permanent identifier:** There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.
- **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- **Veterinarians already adhere to controlled substance regulations:** Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- **Cost:** PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of humans opioid shopping. 32 states have found exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the systems intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients.

Sincerely,



Elizabeth A. Rodger, DVM
After Hours Veterinary Emergency Clinic, Inc.
8 Bonnie Ave
Fairbanks, AK 99701
(907) 479-2700

COLLEGE VILLAGE ANIMAL CLINIC, INC.

JON BASLER, DVM • ALISON CAPITAN, DVM • PETER NICHOLSON, DVM • PAM TUOMI, DVM • ALICE VELSKO, DVM



March 8, 2021

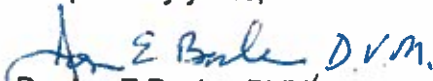
Dear Honorable House Representative Harriet Drummond,

As one of your constituents and as a long-term owner of one of the largest privately owned veterinary clinics in Anchorage, I wanted to contact you to request your support for House Bill 91. I have been a veterinarian practicing in the State of Alaska since 1985 and have owned College Village Animal Clinic in Anchorage since 1998. We have four fulltime veterinarians who routinely practice out of our clinic along with a lead technician who logs and monitors all controlled drugs which are used internally or are dispensed directly to clients from our office. We complied early with the requirements of the Alaska PDMP and have been reporting regularly since 2017. We have been extremely frustrated with the system especially since it is designed for people who have very definitive identification information and is not designed for pets owned by a person (or couples with different last names) nor do animals have as specific identification information as an individual person would.

While we do regularly use and dispense controlled drugs for our animal patients, the drugs we use are generally not high-risk drugs for human abuse and the veterinary profession has NEVER been shown to be an important channel for diversion of controlled drugs into the human population. Multiple other states already have exempted the veterinary profession from reporting requirements. In over thirty years of practice and in overseeing the dispensing practices of our four fulltime doctors, we have only had two instances where we were concerned about inappropriate usage of a dispensed controlled drug (one instance the need and use level was verified as appropriate; the other client we stopped dispensing any controlled drugs). I can safely speak for all of the doctors at our clinic and for my lead technician that complying with the Alaska PDMP reporting system is burdensome, provides little benefit for monitoring actual patient use and is unlikely to identify any actual source of diversion of controlled drugs which might contribute to the opioid epidemic. As required by this law, compliance requires each doctor to take time to log in and search prior to dispensing drugs, both reporting and search forms are not designed for use for animal patients and often searches do not return a positive hit even for patients on chronic medications who have had multiple prescriptions dispensed and were reported by us. We have never had a positive hit on a patient who has had medications dispensed elsewhere (even if reflected in prior medical records). In addition, our doctors need to log in daily and "zero report" controlled drugs whether they are working, on vacation or on maternity leave.

My colleagues and I respectfully request that you pass House Bill 91 out of committee and encourage your support for its passage when voted on in the house floor. Please feel free to directly contact me either by email, at my office or by my personal cell (907-382-7053).

Respectfully yours,


Dr. Jon E Basler, DVM - Medical Director

Dr Peter Nicholson, DVM




Dr Alison Capitan, DVM


Dr Alice Velsko, DVM

COLLEGE VILLAGE ANIMAL CLINIC, INC.



JON BASLER, DVM • ALISON CAPITAN, DVM • PETER NICHOLSON, DVM • PAM TUOMI, DVM • ALICE VELSKO, DVM

March 8, 2021

Dear Honorable House Representative Zack Fields,

As a long-term owner of one of the largest privately owned veterinary clinics in Anchorage, I am contacting you since you are the co-chair of the committee reviewing House Bill 91 and strongly urge you and your fellow committee members to support House Bill 91. I have been a veterinarian practicing in the State of Alaska since 1985 and have owned College Village Animal Clinic in Anchorage since 1998. We have four fulltime veterinarians who routinely practice out of our clinic along with a lead technician who logs and monitors all controlled drugs which are used internally or are dispensed directly to clients from our office. We complied early with the requirements of the Alaska PDMP and have been reporting regularly since 2017. We have been extremely frustrated with the system especially since it is designed for people who have very definitive identification information and is not designed for pets owned by a person (or couples with different last names) nor do animals have as specific identification information as an individual person would.

While we do regularly use and dispense controlled drugs for our animal patients, the drugs we use are generally not high-risk drugs for human abuse and the veterinary profession has NEVER been shown to be an important channel for diversion of controlled drugs into the human population. Multiple other states already have exempted the veterinary profession from reporting requirements. In over thirty years of practice and in overseeing the dispensing practices of our four fulltime doctors, we have only had two instances where we were concerned about inappropriate usage of a dispensed controlled drug (one instance the need and use level was verified as appropriate; the other client we stopped dispensing any controlled drugs). I can safely speak for all of the doctors at our clinic and for my lead technician that complying with the Alaska PDMP reporting system is burdensome, provides little benefit for monitoring actual patient use and is unlikely to identify any actual source of diversion of controlled drugs which might contribute to the opioid epidemic. As required by this law, compliance requires each doctor to take time to log in and search prior to dispensing drugs, both reporting and search forms are not designed for use for animal patients and often searches do not return a positive hit even for patients on chronic medications who have had multiple prescriptions dispensed and were reported by us. We have never had a positive hit on a patient who has had medications dispensed elsewhere (even if reflected in prior medical records). In addition, our doctors need to log in daily and "zero report" controlled drugs whether they are working, on vacation or on maternity leave.

My colleagues and I respectfully request that you pass House Bill 91 out of committee and encourage your support for its passage when voted on in the house floor. Please feel free to directly contact me either by email, at my office or by my personal cell (907-382-7053).

Respectfully yours,


Dr. Jon E Basler, DVM - Medical Director

Dr Peter Nicholson, DVM




Dr Alison Capitan, DVM


Dr Alice Velsko, DVM

2036 E. NORTHERN LIGHTS BLVD • ANCHORAGE, ALASKA 99508
(907) 274-5623 • FAX (907) 272-9114
www.collegevillageanimalclinic.com

March 29, 2021

The Honorable Representative Mike Prax
State Capitol Room 114
Juneau AK, 99801-1185

RE: Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

Dear Representative, Prax:

My name is Will McKenna, and I'm an obstetrician/gynecologist practicing in Fairbanks, AK.

I support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for multiple reasons. First and foremost, the PDMP acts as a one size fits all program that animals do not fit into. Animals are lacking a permanent identifier, potential privacy violations, veterinarians already adhere to controlled substance regulations, and the cost to the state.

- **Animals are lacking a permanent identifier:** There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.
- **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- **Veterinarians already adhere to controlled substance regulations:** Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- **Cost:** PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of humans opioid shopping. Many states have found exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the systems intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients.

Sincerely,



J. William McKenna, MD

466 Slater Dr.
Fairbanks, AK 99701

24 February 2021

The Honorable Representative Wool
State Capitol Room 501
Juneau AK, 99801-1185

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative Wool:


My name is Eric Noll and I came to Alaska after being fortunate enough to get stationed at Eielson AFB in 2016. I have since separated and joined the AF reserves to work in the civilian world, and just recently purchased Kodiak Vision Clinic. Between Kodiak, Anchorage, and Fairbanks I will fairly busy with vision care in Alaska.

I support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for multiple reasons. It seems to me the PDMP acts as a one size fits all program that animals do not fit into. Animals are lacking a permanent identifier, potential privacy violations, veterinarians already adhere to controlled substance regulations, and the cost to the state is high.

- **Animals are lacking a permanent identifier:** There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household. This makes the purpose of tracking medication prescriptions to individuals very difficult, cumbersome, and impossible.
- **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- **From my personal knowledge and friendships with veterinarians, it seems they adhere to controlled substance regulations:** Veterinarians who prescribe or dispense controlled substances are licensed through the DEA. There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- **Cost:** PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly could be seen as a waste of very limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of human opioid shopping. 32 states have found exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the systems intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients.

Respectfully,


Eric J Noll, OD FAAQ/MBA
MAJ USAF
Kodiak Vision Clinic
214 W Rezanof Dr
Kodiak AK 99615

March 24, 2021

The Honorable Representatives Zack Fields, Ivy Sponholz, Calvin Schrage and James Kaufman

Co-Chairs and Members of the House Labor & Commerce Committee
Alaska House of Representatives

Dear Representatives Fields, Sponholz, Schrage, and Kaufman,

As Veterinarians living in Representative Kaufman's district in Anchorage for forty years, and for the last thirty years practicing and owning a clinic in Representative Schrage's district, we write to you asking that you support HB 91, currently being read in the House Labor and Commerce Committee. This is an Act exempting veterinarians from participating in the reporting requirements of the controlled drug monitoring database, known in Alaska as the prescription drug monitoring program (PDMP).

Our profession agrees with the goals of the PDMP and has been complying since its inception, but over time and with modifications to the program, the usefulness of our participation has shrunk while the regulatory burden on us has not. We do and will continue to comply with DEA mandates on ordering, storing, prescribing and accounting for those same controlled drugs.

Currently we are required to report prescriptions filled at our hospital (only those prescribed for more than three days), but not those filled at pharmacies. In our clinic, as in most veterinary clinics, over time we have moved toward keeping fewer controlled drugs in inventory, and outsourcing most prescriptions for those drugs. Those that we do keep are mostly for in-clinic use as well as for compounding and dispensing very small doses for small species (small mammals, birds and reptiles). In those small species, a two or three week prescription might not equal a single dose for an adult human, but does trigger the requirements of the PDMP. Consequently, the reporting that we do accounts for a very small portion of the controlled drugs we use in-clinic or prescribe; the majority are reported by the pharmacy filling the prescription. The regulatory requirements have not diminished, however, and require a labor input out of proportion to any benefit. Regulators are much more likely to catch an unwitting veterinarian in an insignificant error or oversight than they are to catch someone diverting drugs from that veterinarian, and might spend much more time on the former than the latter. For these reasons, we think a veterinary exemption makes sense.

It should be pointed out that thirty-two states have granted veterinarians a waiver from these requirements. We encourage you to support this bill and approve it out of the Labor and Commerce committee.

Thank you very much for your attention.

Respectfully,

Paul Frederickson DVM
Jacqueline Frederickson DVM
P.O. Box 110006,
Anchorage, AK 99511-0006



**NORTH POLE
VETERINARY HOSPITAL**

March 7, 2021

The Honorable Representative Wool
State Capitol Room 501
Juneau AK, 99801-1185

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

The North Pole Veterinary Hospital's staff support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for the following reasons.

- **Animals are lacking a permanent identifier:** There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.
- **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- **Veterinarians already adhere to controlled substance regulations:** Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- **Cost:** PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As a medical provider it is important to the North Pole Veterinary Hospital that the PDMP is used correctly to track trends of humans opioid shopping. Many states have allowed for a veterinarian exemption to their PDMP, allowing veterinarians to continue to provide appropriate care and medical management for their animal patients. Most importantly, the exemption of veterinarians from the PDMP will increase the efficacy for the systems intended purpose, by allowing for accurate interpretation of data and trends in human medicine.

Sincerely,

North Pole Veterinary Hospital: Denali Lovely DVM, Dawn Brown DVM, Melissa Rouge DVM, Mercedes Pinto DVM, McKayla Dick DVM, Josh Link DVM, Bentley Richards DVM, Greg Pietsch DVM, Katrina Backus DVM, Suze Nolan LVT, Alli Pearmine LVT, Krystal Todd LVT, Brent Moors LVT, patty McCall LVT, Sheena Batac LVT, and Lauren Billard LVT.

2942 HURST ROAD
NORTH POLE, AK 99705
(907) 488-2335

March 9, 2021

The Honorable Representative Ken McCarty
Alaska State Capitol
Juneau AK, 99801-1185

RE: HB 91 - Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

Dear Representative McCarty:

Ravenwood Veterinary Clinic has been providing essential veterinary services to the Eagle River community for over 30 years. We offer care and services for small companion and exotic animals.

I urge your support for HB 91 – an ACT exempting veterinarians from the requirements of the controlled substance prescription database, known as the Prescription Drug Monitoring Program (PDMP) in Alaska. The current law in place requiring the participation of veterinarians in the PDMP is not a practical or effective solution for the intended purposes of the PDMP. The system is not useable for veterinarians and animals and is creating unnecessary and disproportionate business burdens for veterinarians, leading to increased taxpayer costs.

These are some of the reasons as to why it makes sense to exempt veterinarians from the PDMP.

- Veterinarians do not treat humans, and animals are not listed in the PDMP independently which renders the PDMP database unusable. Animals are lacking a permanent identifier: There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.
- Potential privacy violations: Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- Veterinarians already adhere to controlled substance regulations: Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- Cost: PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of humans opioid shopping. 32 states have found exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the systems intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow them to continue to provide appropriate care and medical management for their patients.

Sincerely,

Dr. Jamie Lee Merrigan, clinic owner
Dr. Lorelei Hass, associate veterinarian
Dr. Michelle Wetherell, associate veterinarian
Dr. Megan Turnquist, associate veterinarian
Dr. Harrison Wellman, associate veterinarian
Dr. Susan Wagnon, associate veterinarian

Ravenwood Veterinary Clinic
16743 Coronado Road
Eagle River, Alaska 99577

March 7, 2021

The Honorable Representative Wool
State Capitol Room 501
Juneau AK, 99801-1185

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative, Wool:

As a practicing relief veterinarian, who travels between local veterinary hospitals in Fairbanks and Anchorage, the PDMP is a great hindrance in performing to my utmost capabilities for the practices I serve. In addition to seeing a full caseload at clinics, where I may not be familiar with staff, protocol, and clientele, it requires me to expend additional time, which is unnecessary, for the reasons listed below. As a relief veterinarian, I often do not have the luxury of carrying over patient care and record-keeping to subsequent days and must maximally utilize my time at the hospitals who engage my services.

I support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for multiple reasons. First and foremost, the PDMP acts as a one size fits all program that animals do not fit into. Animals are lacking a permanent identifier, there are potential privacy violations against owners, veterinarians already adhere to controlled substance regulations, and the cost to the state.

- **Animals are lacking a permanent identifier:** There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.
- **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- **Veterinarians already adhere to controlled substance regulations:** Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements to which veterinarians adhere.
- **Cost:** PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As a medical provider it is important to me that the PDMP is used correctly to track trends of humans who may be opioid shopping. Thirty-two states have granted exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the system's intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow continued deliverance of appropriate care and medical management for their patients.

Sincerely,

Valerie Y. Warmuth, DVM
Veterinary Solutions, LLC

565 Silver Lining Drive
North Pole, AK 99705

February 23, 2021
The Honorable Representative Wool
State Capitol Room 501
Juneau AK, 99801-1185

RE: Exempt Veterinarians from the Prescription Drug Monitoring Program - Vote YES on HB 91

Dear Representative Wool:

Introduction paragraph – We are veterinarians at Kodiak Veterinary Clinic, the only vet clinic on Kodiak, Ak. We support the exemption for veterinarians from Alaska’s Prescription Drug Monitoring Program (PDMP) for multiple reasons. First and foremost, the PDMP acts as a one size fits all program that animals do not fit into. The PDMP database is not useful as animals are lacking a permanent identifier. Logging client information within a useless database creates potential privacy violations, and veterinarians already adhere to controlled substance regulations. Upkeep of a useless database is a needless drain on the state budget.

- **Animals are lacking a permanent identifier:** There is no permanent identifier for an animal. Animals can have different names and owners throughout their lifetime. The animal can also have different owner names from within the same household.
- **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses much like physicians are not trained in the dose ranges for dogs, cats, birds, elephants, etc.
- **Veterinarians already adhere to controlled substance regulations:** Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- **Cost:** PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As medical providers it is important to us that the PDMP is used correctly to track trends of human opioid shopping. 32 states have found exemption for their veterinarians from participating in the PDMP. The exemption of veterinarians from the PDMP will increase the efficacy for the system's intended purpose, by allowing for accurate interpretation of data and trends in human medicine. Veterinarian exemption will allow human practitioners to continue to provide appropriate care and medical management for their patients.

Sincerely,



Emily Iacobucci DVM
Kodiak Veterinary Clinic
1914 Mill Bay Rd.
Kodiak, AK 99615



Melissa Smith DVM



SOUTHEAST ALASKA ANIMAL MEDICAL CENTER

8231 Glacier Highway, Juneau, Alaska 99801

Phone (907) 789-7551

Fax (907) 789-3067

Steven M. Torrence, DVM
Gerald G. Nance, DVM

Lisa J. Kramer, DVM
Tracy I. Ward, DVM

March 5, 2021

The Honorable Representative Andi Story
State Capitol Room 403
Juneau AK, 99801-1185

RE: Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

Dear Representative Story:

We are the owners and associate veterinarians of Southeast Alaska Animal Medical Center in Juneau. We are Alaskan small business owners and veterinarians, and are all members of the Alaska Veterinary Medical Association, including Dr. Ward as the association's President-Elect.

We support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for many reasons, including:

- **Animals are lacking a permanent identifier:** There are no permanent identifiers for animals. In fact, animals can have different names and owners throughout their lifetime. As well, at any given time, an animal can also have multiple owner names from within the same household, making knowing which person to search in the PDMP database impossible.
- **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses, just as physicians are not trained in the dose ranges for dogs, cats, birds, horses, etc.
- **Veterinarians already adhere to controlled substance regulations:** Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- **Cost:** PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is significantly more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As medical providers it is important to us that the PDMP is used correctly to track trends of human opioid shopping. Thirty-three states currently exempt veterinarians from participating in the PDMP,

because they recognize that the system was not set up for, nor is conducive to, veterinary use. Exemption of veterinarians from the Alaska PDMP will improve the efficacy of the system's intended purpose, by allowing for accurate interpretation of data and trends in human medicine. In addition, veterinarian exemption will allow us to continue to provide appropriate care and medical management of our patients.

Sincerely,



Dr. Steven Torrence



Dr. Lisa Kramer



Dr. Gerald Nance



Dr. Tracy Ward

Southeast Alaska Animal Medical Center

8231 Glacier Highway

Juneau, AK 99801

(907) 789-7551



SOUTHEAST ALASKA ANIMAL MEDICAL CENTER

8231 Glacier Highway, Juneau, Alaska 99801

Phone (907) 789-7551

Fax (907) 789-3067

Steven M. Torrence, DVM
Gerald G. Nance, DVM

Lisa J. Kramer, DVM
Tracy I. Ward, DVM

March 5, 2021

The Honorable Senator Jesse Kiehl
State Capitol Room 419
Juneau AK, 99801-1185

RE: Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program.

Dear Senator Kiehl:

We are the owners and associate veterinarians of Southeast Alaska Animal Medical Center in Juneau. We are Alaskan small business owners and veterinarians, and are all members of the Alaska Veterinary Medical Association, including Dr. Ward as the association's President-Elect.

We support the exemption for veterinarians from Alaska's Prescription Drug Monitoring Program (PDMP) for many reasons, including:

- **Animals are lacking a permanent identifier:** There are no permanent identifiers for animals. In fact, animals can have different names and owners throughout their lifetime. As well, at any given time, an animal can also have multiple owner names from within the same household, making knowing which person to search in the PDMP database impossible.
- **Potential privacy violations:** Searching the PDMP database by the owner could provide medical information the owner is uncomfortable with their veterinarian knowing. Secondly, veterinarians are not trained in human medication doses, just as physicians are not trained in the dose ranges for dogs, cats, birds, horses, etc.
- **Veterinarians already adhere to controlled substance regulations:** Veterinarians who prescribe or dispense controlled substances are licensed through Drug Enforcement Administration (DEA). There is already a significant level of accountability, record keeping, and medication storage requirements that these veterinarians adhere to.
- **Cost:** PDMP review and reporting constitutes a disproportionate impact on veterinarians as small business owners. Veterinary clinics lack the standardized software used in human health care facilities, so reporting is significantly more labor-intensive and costly. Additionally, the cost to investigate veterinarians who fail to use the database correctly is a waste of very limited resources.

As medical providers it is important to us that the PDMP is used correctly to track trends of human opioid shopping. Thirty-three states currently exempt veterinarians from participating in the PDMP,

because they recognize that the system was not set up for, nor is conducive to, veterinary use. Exemption of veterinarians from the Alaska PDMP will improve the efficacy of the system's intended purpose, by allowing for accurate interpretation of data and trends in human medicine. In addition, veterinarian exemption will allow us to continue to provide appropriate care and medical management of our patients.

Sincerely,



Dr. Steven Torrence



Dr. Lisa Kramer



Dr. Gerald Nance



Dr. Tracy Ward

Southeast Alaska Animal Medical Center

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March 17, 2021

To: The Honorable Representative Wool
State Capitol Room 501
Juneau, AK 99801-1105

Re: Vote YES on HB391, Exempt Veterinarians from the
Prescription Drug Monitoring Program

I am a licensed, working veterinarian in the state of Alaska. I own my own business and am the contract veterinarian at the FNSB Animal Shelter, while also providing mobile services for both small and large animal patients.

I support the exemption Alaska's Prescription Drug Monitoring Program (PDMP) for veterinarians. Veterinary animal patients cannot adhere to the requirements of the program which was designed for human patients. Animals lack permanent identifiers, can have multiple owners, and names. Veterinarians are also already licensed with the DEA, with stringent drug tracking requirements. Additionally, there are serious privacy violations, with a veterinarian having access to a client's medical information (vs just their pet).

I support the intent of the PDMP in tracking the misuse of opioids by humans. However, it is a costly and illogical fit for the veterinary profession. Please join the 32 states that have exempted veterinarians from the program.

Tamara Rose DVM


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March 31, 2021

RE: HB 91 – Exemption for veterinarians from Alaska's Prescription Drug Monitoring Program

To whom it may concern:

I am the owner of a busy, 4 doctor, small animal veterinary practice located in Fairbanks, Alaska. I writing to you today as a veterinarian, but also as a business owner to express my support for HB 91 and hope that the current legislature will pass this bill.

The requirement to participate in Alaska's Prescription Drug Monitoring Program (PDMP) system was introduced to our profession with minimal notice and zero training. Despite this, the veterinarians at our practice did sign up and attempt to comply with the requirements, a task that has been difficult, time consuming and frustrating.

When it comes to utilizing the current system for animal patients, there are many flaws in how the system works. For instance, many pet owners will give different variations of their pets' name as well as estimated birth dates when they go to different veterinary practices.

Most veterinary practices in the state will tell you that they are understaffed, especially when it comes to professional staff (DVMs as well as certified technicians). Since we are understaffed, our schedules have tremendous pressure put upon them just in dealing with our case load. The requirement to participate in the PDMP adds an additional time consuming burden within our daily practice, and that time is essentially wasted because currently, veterinary participation in the PDMP is not preventing diversion from pet prescriptions to the human market.

The opioid crisis is a significant concern in today's society. Even without the PDMP program in place, my associates and I do our best to prescribe opiates carefully and taking into consideration any potential for abuse while also providing quality care and medicine for my patients. Perhaps continuing education and training in how we can better help with the opioid crisis would be a better use of the state's resources.

Barbara J Cole DVM
Owner
Aurora Animal Clinic